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ABSTRACT

Evaluation affects the people who participate and the situation studied, and there is no guarantee that the effects will be democratic, constructive, or equitable. A case study illustrates that even the most scrupulous attention to ethical principles and procedures for the release of information cannot always protect the interests of participants in the study, or the integrity of the study itself. At issue was a male school principal instructing a female teacher to change the record of what she had said in evaluating a language curriculum project. The objectives of the paper are the following: (1) to demonstrate the way in which local reactions to an evaluation directly threatened its validity; (2) to demonstrate that not all participants in a qualitative evaluation study understand or defer to the commitments of democratic evaluation; (3) to indicate that the metapolitical analyses of evaluation approaches do little to inform the nature of local site effects; and (4) to identify some new theses about the practice of "democratic" evaluation. (MLF)

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Dilemmas in democratic evaluation:

Politics and validation

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Introduction

Evaluation is a reflexive activity. It affects the people who participate and the situation studied, and there is no guarantee that the effects will be democratic, constructive or equitable. Most of the critique of evaluation involves analysis of the political relationships between program participants, program sponsors, program evaluators and their respective institutional affiliations. Arguments for 'qualitative', 'naturalistic' and 'case study' approaches to evaluation are based on the importance of all involved and affected participants' interpretations of life in social and educational programs. Such approaches are justified on two main grounds: political and substantive. Political grounds attribute participants 'equal rights' to comment on programs. Substantive grounds recognise the validity of interpretations of the program is not a function of the relative power and status of researchers, policy-makers, and program workers. Rather the opposite is that case, the validity of the evaluation is regarded as suspect unless different perspectives, descriptive and evaluative, are given expression and taken into account. But these analyses do not engage the ways in which any 'external' evaluation itself impinges on the lives of program participants at the 'local' level.

The first objective of this paper is to demonstrate the way in which local reactions to an evaluation directly threatened its validity. A second objective is to demonstrate that not all participants in a qualitative evaluation study (which aimed to be democratic, but within certain institutional and procedural constraints) understand or defer to the commitments of democratic evaluation. A third objective is to indicate that the metapolitical analyses of evaluation approaches do little to inform the nature of local site effects. MacDonald's (1976) well-known distinction between 'democratic', 'bureaucratic' and 'autocratic' approaches invites a view of democratic approach of evaluation which results in so-called democratic evaluation approaches which may not be democratic at all. There is an important distinction between 'participatory' and 'representative' democracy which is too often disregarded. A fourth objective is to identify some new theses about the practice of 'democratic' evaluation, to improve the way 'evaluation' understands the nature of social and educational change, to improve the relevance of evaluation to social and educational improvement, but at the same time to suggest that what is 'democratic' is very situational and made problematic by concrete practice.

The case

The following account of an instance within a democratic evaluation which used a case study approach illustrates that even the most scrupulous attention to ethical principles and procedures for the release of information cannot always protect the interests of participants in the study, or the integrity of the study itself. Departures from the principles and procedures by participants left the evaluation team with intensely problematic alternative courses of action. The account has been anonymised and certain unimportant features have been fictionalized for reasons which will become obvious.

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The evaluation study was one of several I have participated in over recent years. The Principles of Procedure for the control of the release of information by the evaluation were an early version of those developed and subsequently published by Kemmis and Robottom (1986). Those authors note that the principles have been observed for several years in a variety of ways by evaluators in the naturalistic case study evaluation tradition (see also Simons (1987)). The principles used are thought to provide a way of making an externally commissioned evaluation as democratic as possible by giving participants considerable control over the interpretation and release of information. With respect to the issues addressed here, the Principles of Procedure used in the study were not significantly different from the published Kemmis and Robottom (1986) version (see Appendix A for the actual principles used).

For the purposes of this account, it is sufficient to describe the program being evaluated as the 'Language Curriculum Project', where students with particular weaknesses in language were to visit a neighbouring school for specially funded language tuition. The project was one of many in the past decade or so supported by the Australian national and state governments which aimed to offset educational disadvantage of different kinds with specially funded programs.

Because the evaluation study involved only a few sites, each of which was quite distinctive, the anonymisation of participants in reports of the study itself was not considered feasible. This was so even though the sites were quite widely distributed around Australia. While it might have be possible to disguise the identities of individuals to people without knowledge of particular sites, people at each site would almost certainly have been recognizable to site colleagues because of the distinctiveness of their roles and other cues. Because it was effectively unavoidable, in my communication with participants in the evaluation I expressed a preference for identifying participants in the evaluation report, but only with their permission. I asked people to release information with its eventual public character in mind (see letters below).

The wide distribution of sites also made the 'case' itself rather attenuated. This was compounded by the intermittent nature of the program's activities, and by the substantial departure of program activities from the intended goals of the program. The program was so much reinterpreted by site participants it was not always clear whether what was happening was an example of the 'case' we were commissioned to study. We agonised several times as to whether we should report that observation, terminate the study, and return the grant. But the way the program had panned out seemed to us to be a useful thing to understand, so we proceeded.

In a superficial sense, the 'boundaries' of the case were reasonably clear. We simply had to find where the program money had gone to. That was not difficult, but finding out how its purposes had been so obscured or distorted before it actually got to those who were meant to make use of it was another kettle of fish. Furthermore, the sheer geographical extent of the case strained the budget for the evaluation. This made fieldwork rather compacted, and all of these factors combined influenced the possibilities and nature of the democratic practice the evaluation team could engage. We tried, but I have grave reservations about how successful we were.

The instance

The two key actors in the account are the male school principal, and the female language teacher employed to work on the Language Project in an untenured position -- on 'soft money'. Both were made aware of the Principles of Procedure in general terms, but were not given actual copies of them in advance. When interviewed the principal was amiable, helpful, apparently supportive of the Language Curriculum Project, appreciative of the 'responsive' approach taken by the evaluators (Stake, 1975), and indicated his preparedness to help the evaluation in any way he could. He spoke of the Language Project in glowing terms, and was proud of the school's engagement in it. He indicated that he was not aware of any of the operational details of the Project and encouraged me to speak with teacher directly involved. It was clear also from

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what he said that other teachers were unlikely to have any knowledge of the project. From his perspective the project was a good idea, but the details were left to two staff, one of whom was not available to the evaluation team.

The teacher's account of the Project was not so positive. She criticized the Project severely on three grounds which can be summarized in the following way. First, the curriculum which she had been encouraged to develop had not really been matched to the kinds of disabilities the intended students had, though she had never been told exactly who the intended students were meant to be. Second, the students were being selected in ways which meant they were not the client group for whom funds had been provided. And third, the organization of the Project was a 'disaster,' with students were arriving unannounced, at the wrong times, from schools which had not indicated participation in the Project and which would not have been the primary target schools for the Project. The verbal information she presented to support her claims was supported by enrolment records, by our observation of the students, and by the students' own comments.

The activities the teacher constructed for the students who did arrive seemed engaging and useful to the students, and her ingenuity and calm in coping with the surprise arrival in the school foyer of a troupe of students from other schools was remarkable. Nevertheless, after the event, she expressed annoyance at the inconvenience she had been caused, and also at what she saw as the misdirection of project funds (several other teachers we interviewed at other sites had been largely unaware of any of the commitments accepting the funds entailed because they did not where the funds actually came from). This teacher's criticism criticism was so strong, I asked her at the time whether she was sure that her comments should go on the public record and be attributed to her. She was adamant about that, saying that it was important for people to realize what had happened. I still had reservations, but almost felt obliged to use what she had said.

The Principles of Procedure which guided the study dictated two phases for the negotiation of the release of information. The first phase involved the negotiation of the substance of interview and other observational data. The second phase invited participants to react to the interpretations made by the evaluator in the construction of the draft version of the final report.

The teacher and principal were each sent copies of the record of the interview conducted, a copy of the Principles of Procedure, and the following letter:

> *Dear .....,*
>
> *Please find enclosed my edited record of our discussion during my recent visit. As I may have indicated when we talked, the evaluation team like to give participants in the study the opportunity to correct or improve our record of their statements. Please note in the enclosed outline of the study the 'Principles of Procedure' to which we are committed.*
>
> *We are concerned that the record is fair, relevant and accurate. We would also like participants to indicate any comments which are an accurate record, but which they would prefer not attributed to them personally. Our strategy with such comments if they are reported in the study will be to disguise the identity of the utterer -- 'a teacher reported ... ' or 'a Senior Officer in the Education Department in one state said ... '. It is our preference to identify people, but we will not do so without consent. We will not identify any students in reports of the study.*
>
> *We would be grateful for any corrections which need to be made, and for any further information which you believe will assist our understanding. If we do not receive an amended statement from you before ....., we will assume that you are comfortable with the document as it now stands. Would you please address your response to me as follows:*

Dr Robin McTaggart
School of Education
Deakin University
Geelong
Victoria, 3217 (Telephone: 052 471448 or 052 471483, for messages).

Thank you for your help.

Yours faithfully,

Robin McTaggart.

The principal returned his record of interview with minor, perhaps pedantic corrections. The teacher was a little late in returning her reply, so I contacted her by telephone. She suggested a couple of minor changes for clarification and a few grammatical corrections, for example, preferring the word 'students' to 'kids'. She reaffirmed that it was important her comments were on the record. I asked her to send a copy of her corrections to confirm what had been agreed by telephone. She agreed that the final report writing could go ahead, and seemed surprised that I was being so cautious. She saw no problem at all with my using the information and explicitly attested to the fairness, relevance and accuracy of our record of her words. Indeed, she said again that she had given it to us for the very purpose of publication, and expressed impatience with my hesitation. We did not have a written statement of her release and validation of her words, but this was not required by the Principles of Procedure and I took the view that her statement could be used. We decided to quote her to encapsulate the kinds of things people at several sites we had visited were saying.

At this time, the writing of the draft final report was well under way. It was in the mail to study participants in about two weeks. The promised confirmation of the teacher's record of interview had not been received before mailing, but I proceeded on the basis of her assurances in our telephone conversation. Draft final reports were sent to study participants with the following memo:

Language Curriculum Project Evaluation Study

Draft Report

The enclosed draft of the final report of the evaluation of the Language Curriculum Project has been circulated only to those participants who have been quoted directly. In all but one or two cases, the comments attributed to study participants have been cleared with them already. All participants identified in the study are invited to check their own comments and interpretations made by the Language Curriculum Project evaluation team.

*The **Principles of Procedure** to which the Language Curriculum Project Study is committed are included in the report itself as an **Appendix**. Participants may wish to refer again to those principles before deciding whether to respond to this draft report. The authors' basic commitment is that the report be **fair, relevant** and **accurate**, and invite participants to read the report with these criteria in mind.*

*The report will be amended according to the **Principles of Procedure** in the light of comments received, and will then be published.*

Written comments on the draft report should be directed to:

Dr Robin McTaggart

School of Education
Deakin University
Geelong
Victoria, 3217.

The deadline for responses is ..... Beyond that date the authors will assume that participants who have not responded approve the release of the document in its present form.

Robin McTaggart may be contacted by telephone at Deakin on 052 471448 or 052 471483 for messages.

Thank you once again for your contribution to the study.

A few days after the draft report arrived at the various sites, an amended record of interview was received from the teacher. The changes she had made were extensive, with all of the criticisms of the Language Curriculum Project which had been previously released either deleted, or so completely submerged that they were virtually imperceptible to the reader. Important testimony for the evaluation was now apparently withdrawn. I was concerned about the loss of data, but because of the teacher's earlier attitude I was even more concerned about what might have happened. I was also curious about the turn of events. The site was too distant to visit again, so I telephoned her to find out.

She was angry, but not with me. When the principal had read the draft final report, he had also read the interview which the teacher had previously approved for release (by telephone). He had summoned her to his office and instructed her to change the record of what she had said. The reasons she reported to us were that the principal thought the interview reflected adversely on the school and implicitly on his supervision of the staff member responsible for the organizational arrangements. That staff member apparently had been absent from the school periodically without permission from the principal. However, according to the Project teacher, the fairness, relevance and accuracy of her testimony were not questioned by the principal, at least in these terms. He wanted to change her words even so.

The principal's actions were in direct violation of the Principles of Procedure to which he had agreed in general at our first meeting, and which he now had in front of him having seen them also when his interview was returned to him for comment. My first impulse was to contact him but I decided against it for several reasons. I had interviewed him and my records of the interview with him were negotiated according to the Principles of Procedure. He said he did not know much about the operation of the program which is probably not unusual in such cases. At the time he had the reported conversation with the teacher about the content of the interim report, he had before him a written invitation to contact me to suggest changes to the interim report's data and interpretations with reference to the criteria of fairness, relevance and accuracy and the Principles of Procedure in the letter. He did not respond in that way but instead apparently decided on the course of action reported -- to force the teacher to change her testimony.

We thought his reaction was excessive, but he may have seen himself in an invidious position. What rights did he have now that the evaluation had actually increased his understanding of what had been happening in the program? That is, the Principles of Procedure might have underestimated the dynamism of the site, both substantively and politically. If the principal acted to change things immediately, how could the teacher's account any longer be true? But its earlier truth was important to the evaluation.

Referring to her rights under the Principles of Procedure, I asked the teacher if she had resisted the principal's efforts to force her to change her comments. She relived the anger of the confrontation and assured me: 'I know how to dig my heels in!' She went on angrily:

> Do you know what? He even mentioned my terms and conditions of employment! Can you believe that? I wouldn't mind so much except that if I go, I expect that the Language Project will go with me. So you see, I don't have any choice.

I considered sticking to the original release agreement, but felt it unfair to do so when the only potential victim was reluctant to do so. I suggested we might try to work out a form of words which was acceptable to her, and which might still make the points she wanted to make a little more subtly. She was happy about that, but indicated her desire to check the product with the principal again. According to her, this made matters worse. His reaction was to throw his hands in the air and say to her, 'Write what you damn well like!' Knowing the ramifications, the Project teacher decided to go back to a form of words very close to that which she said the principal had imposed upon her in their first confrontation.

Whether or not the amended interview 'record' was still useful to the evaluation is an important issue. Should a public 'right to know' take precedence over the individuals' rights to 'own the facts about their lives', as Barry Macdonald once put it? Of course, who owns the facts is at issue here.

Even if the situation had changed it seemed important to us to indicate in the evaluation report that in the ordinary circumstances (without the influence of an evaluation team) the program was not working well as a central participant saw it. Perhaps the Principles of Procedure negotiated too much away anyway. I felt committed not to publish the original interview even though it had been released, basically because of the implicit claim of the teacher that it would be unfair if the evaluation became an instrument of her dismissal and consequently of the demise of the program, at least in this way. I was of the view that the validity of the report had been compromised, though we were able to present other data to support the general observation the teacher's testimony so neatly informed.

Issue 1: The 'truth' of the teacher's testimony

We were satisfied that the teacher's original testimony was accurate. There was corroborating evidence, and the situation was not uncommon in the sites we had visited. The logistics of getting students from school to school, identifying appropriate participants, and ensuring their timely arrival were demonstrably beyond the resources of the schools' capacity to cope (a point made in the draft report which might have mitigated any concerns the principal had). But what evidence did we really have that the teacher was not just making the whole thing up when she changed her testimony?

The only other informant who could help out there was the principal who had opportunity to present 'his side of the story': he was interviewed, and corroborated our record; and had a written invitation in front of him to comment to us by telephone or in writing at the very time of the altercation with the teacher. His statement indicated that he did not know this level of detail about the program, so he could not refute what she said. The evidence we have presented explains how we dealt with the situation and how we interpreted it. It is possible that the teacher was lying about the threat, but testimony from the principal about the conversation could not confirm that (though we might regard an admission from him as corroboration of the teacher's claim). We would still be judging the veracity of the teacher's claim on the basis of her testimony, and our observations of her other actions which indicated reasonably unequivocally that she had been given a hard time by the principal.

What could we have done? Take further action which the major victim had already claimed would further jeopardise and worsen her position? We might have even interpreted her request that we not talk further with the principal as a violation of the Principles of Procedure which guarantee the right of the evaluation team speak to anyone who might inform the study, implicitly as many times as we considered necessary. We may have acted differently, we may have even made the evaluation more 'democratic', but it is my view that our actions were

completely compatible with the Principles of Procedure and the commitment to democratic evaluation practice, and certainly no less democratic than any alternative course of action. Perhaps we could have collected the principal's account of the conversation and taken the risk of making matters worse, but if the account was different, would we then be obliged to go back to the teacher for her response, back to the principal again.....?

This issue is partly a function of the attenuated nature of the case. Because the site had so few participants and the presence of the program relatively transient (a few weeks at a time) it was simply difficult to get testimony; there were few informants. The evaluation budget did not run to protracted observation either.

Issue 2: Who was at risk?

All parties (including the evaluators) are 'at risk' in an evaluation. But 'risk' is not a dichotomous variable. There are degrees of risk which are very much a function of the power (including access to information) which people have. It is apparent from the events described that the principal thought he had something to lose from the data. Though we should not simply take that at face value. It is possible that the principal saw that the evaluation might threaten a program he valued, failed to convince the teacher that her commitment to truth was foolhardy and forced her to falsify her testimony in order to protect her from her own folly -- a bit patronising, but not absolutely refutable on our evidence. The teacher's veto on further questioning of the principal made it impossible to check that interpretation. On the evidence we have, which is the teacher's testimony and our observations of her manner, it does not seem likely that the principal was acting on the teacher's behalf.

The evaluation despite its aspirations to being 'democratic' probably shifted the balance of power towards the principal. That is, despite strict care in the observance of the Principles of Procedure the evaluation had already done what damage it might have done to the relationship between the teacher and the principal. It was released interview data which had brought the teacher's point of view to the attention of the principal. Perhaps her situation was retrieved somewhat by the opportunity the principal took to change what she had said (in spite of the method he used). But there was no guarantee about that. She was already on record as someone who was prepared to speak out critically, and that in itself had put the Language Project at that school in jeopardy, at least if we can believe her account of the threats which were made. Perhaps the program should have been terminated, but these were not appropriate reasons for its demise.

The evaluation had incidentally threatened the future of the program, but more importantly appeared to have shifted the balance of power in the school in favour of the principal. He now had several 'reasons' for terminating both the program and the teacher's employment, reasons which were incidental to the quality of the program and to the findings of the evaluation itself. As far as this part of evaluation itself was concerned, we were not in a position to find out any more about the program, or about the site effects we had set in train. But we had found out enough to feel uneasy about the alternative explanation of our effect on the principal-teacher relationship. We did not think that he would suddenly be enamoured of this outspoken and critical transient teacher.

The gender relationship here is familiar: according to the testimony we had the male principal domineering the untenured female staff member. Institutional power does reside with men, and women are subjected to shaky forms of employment. Sexism is structural and ideological, and is a reasonable general explanation of the power differentials which are important in this case. But I do not want to pursue the gender issue per se. Rather, I want to direct attention to intra- and extra-institutional power differentials themselves and their relationship with the evaluation process.

Issue 3: What are we doing here?

For site participants it must be quite difficult to believe that they are participating in a democratic process when a stranger equipped with a set of procedures comes in for a few days of interviews, document analysis and observation. In several evaluation projects I have begun fieldwork by sending to prospective informants a copy of the general outline of the study and a statement of 'principles of procedure', often to find that neither document has been read. I doubt that much substantive gain is made by explanations of principles of procedure which precede interviews and observations either. Most people simply know too little about what they might be letting themselves in for to make informed choices about participating (or controlling what they say). The common experience that Directors of Education are likely to have their records of interview retyped by their secretaries while less influential informants do not even reply to requests for changes or for validation ought to help us to locate ourselves on the political spectrum. Is there any way the 'external evaluator' can actually work in uncoopted ways?

The report

In the study we conducted above we presented several issues and findings which were critical of the results of the program. On reflection, I think some case study researchers might think the tone of our report too judgmental, though the judgments were collected from participants rather than made by us. However, even though they were fairly represented and were carefully documented in the report the overall impression was unequivocal. Criticism was evident in all quarters. Informants criticised the program management (from government down) for being blind to the ways in which the aims and funds from the program were being diverted by longstanding organisational practices which were not particularly visible and politically difficult to change. The evidence of diversion was very strong. Also criticised were teachers -- they were not dismayed by the diversion of Project funds. People had been able to do what they saw as useful things, and there was little concern that Project aspirations had not been faithfully realised or that funds intended for disadvantaged students had not always reached their target.

We had not found anything which might be regarded as exemplary practices within the program which might be published for others to emulate (a hope we shared with the sponsors). We found good ideas and good practices, but not under the umbrella of the program (We had outlined in our proposal an excursion outside the program for exemplary practices). We believed that we had documented ways in which the management and rationale of such programs were questioned by program staff and that we had also indicated their views about how things might be changed for the better. The emphasis of the report was on the way project goals had been blurred as project money and project ideas wended their way through the institutional structure and we were careful not to attribute blame, fearing that the problem was one of structure rather than inept agency. Attributing blame was out of the question anyway because we did not have the resources (or charter) to understand exactly the pre-emptiveness of prior organisational arrangements and appointments.

Our feeling was that we had supported the disadvantaged young people the program was meant to help. We felt we had done so without presenting criticisms (because we could not find any of substance) of those people working on very shaky terms of employment on the fringes of the school system those young people who were often more than others in and around schools could handle. We offered surrogate experience, interesting examples and frustrating constraints, and presented each in what we thought were accessible ways to the several relevant audiences, but finished up with hardly any audience at all. We were congratulated on the thoroughness of our research and the quality of the report, but it was never published by the sponsors.

In the instance and in general, we wondered if we had contributed to the democratic process in any other way than to advantage the already advantaged.

Limits of democratic evaluation

The general difficulty we confront here is what makes evaluation 'democratic'. In particular there is the problematic role of the 'external' evaluator, the nature of his or her 'insertion' into the political context of the case, and the way in which knowledge external to the case is brought to bear to inform it. That evaluation is an ideological process which affects the distribution of power is obvious and widely documented. The best known encapsulation of the ideology of evaluation is MacDonald's (1976) division of evaluation into autocratic, bureaucratic and democratic forms. MacDonald is an advocate of democratic approaches to evaluation, though his conception of what 'democratic' means in the context of 'external' evaluation[1] has been criticized by Lakomski:

> Just as democratic evaluation 'takes for granted' the political framework of liberal pluralism so it accepts uncritically the very program it evaluates. More specifically, it does not raise the question of how and why this program came to be conceived and implemented. Worse, it cannot even raise the question given its grounding in social phenomenology ... The consequence of the inability to account for the genesis of social and educational programs and to judge their worth leads democratic evaluation implicitly to affirm the status quo. (Lakomski, 1983, p. 273)

There is an obvious overstatement here which I will deal with first. Democratic (naturalistic case study) approaches to evaluation are not purely phenomenological for two reasons. First, the 'case' is often includes people who do attribute meaning to the case in the very terms Lakomski say they don't. And second, it is difficult to prise apart into separate realms of logic of the discourses of liberal pluralism and critical theory to which she is alluding at this point. Concepts like hegemony, ideology, resistance can easily part of the ordinary discourses of some cases themselves. Nevertheless, the point Lakomski makes raises an important issue. There are understandings and theoretical perspectives available which may go beyond those of the case participants and which might help to explain the 'contained' way in which the program is understood. The problem with purist phenomenological approaches to evaluation is that they do not commit themselves to making these other potentially enlightening and educative perspectives an aspect of the reporting of the case. Their aspiration is to tell it like it is the terms and understandings of the most directly affected participants. The other side of that coin is the problem of 'democratically' making new knowledge available without at the same time practising the epistemological imperialism which sometimes characterises the work of professional researchers. Both interpretivism and epistemological imperialism risk creating the same outcome: affirming the status quo as Lakomski has argued.

In the instance and case cited above, the democratic approach probably did more harm than to confirm an inequitable status quo. There is a real chance it made matters worse.

The Lakomski analysis is obviously pitched at different level to the issue raised by the confrontation discussed above, though they are related in important ways. Lakomski was aware that even democratic evaluations are usually commissioned by policy makers in a social and political structure which surrenders to 'bureaucratic rationality' (Rizvi, 1986) much of the participatory ethic and practice implicit in the ordinary conception of democracy. The question is whether evaluation practice might ever become sensitive to these local issues when it is so intimately linked to the knowledge production apparatus of the institutionalised state.

Lakomski suggested that the answer lies in recognizing that method of enquiry itself is value laden, and that enquiry based on a critical epistemology is less likely to confirm and compound existing differentials of power and status. She noted MacDonald's acknowledgement that

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[1] Note that MacDonald (1978) has also argued for 'self-evaluation' as an expression of the democratic impulse in evaluation

> Evaluation should be concerned not just with choices within given programmes (formative evaluation) nor choices between programmes (summative evaluation) but with choices between policies and between policy-making processes. (MacDonald, 1978, p. 11)

She then went on to argue:

> Evaluation must not be content with choices between, it must also examine those very policies and policy processes with regard to their ideological assumptions. *But such critique of ideology cannot take place within the phenomenological perspective*. That has to be abandoned in favor of a critical epistemology and and theory of education. (Lakomski, 1983, p. 274, emphasis in original)

Lakomski's general point of view is strongly supported in the literature (for example, Bernstein, 1976; Fay, 1975; Habermas, 1972, 1974, Carr and Kemmis, 1986). But there is an important cleavage between the different critical perspectives which hinges upon the nature of the relationship between the researcher and the researched. Most critical approaches to educational enquiry (including evaluation) recognize the importance of analyzing power differentials, typically expressed with reference to hegemony to embrace ideological as well as practical forms of domination.

But what does it mean to act democratically when one is a researcher (or democratic evaluator)? Is it sufficient to write a report which faithfully records the world as participants in the case see it, and perhaps to offer historical-materialist accounts of why people see things in the ways that they do? If the answer is to engage the practical political struggle for improvement with those whom the study has touched, or whom the act of research is touching, what is the nature of the relationship between the people studied, the state and the commitment to knowledge production?

In the critical theory literature on research methodology which relates to education there are wide differences in the extent to which the researcher should feel committed work directly with people, rather than merely study them. The nature and strength of that commitment affects not only the nature of evaluation contracts researchers should be prepared to sign, but whether researchers will work at all in those 'external' evaluation roles. The diversity of positions is quite easily shown. For example, Popkewitz builds the case for critical approaches to educational research ahead of empirical-analytic and interpretive approaches, but then takes an individualistic, liberal position:

> What I cannot argue for is the superiority of any single paradigm for considering the complexities of schooling. Each intellectual tradition provides a particular vantage point for considering social conduct. The different paradigms can enable us to gain great insight into the whole and into the relationship of the elements to that whole... In this sense I am willing to adopt a liberal-democratic perspective to the problem of social science. (Popkewitz, 1984, p. 54)

According to Carr, an advocate for action research (that is, research done by people (for example, within a program) by and for themselves) the assumption that research paradigms are complementary rather than expressions of political contestation leaves Popkewitz with a rather ambivalent position on the role of the researcher. In reviewing the Popkewitz volume, has been sharply critical on this very point:

> All ... that he can positively recommend is the development of a 'self-critical quality that enables researchers to scrutinize the assumptions, implications and consequences of their work'. What Popkewitz conspicuously fails to recommend is how this 'self-critical quality' is to be achieved. For me, this reluctance to embrace the full implications of its own central argument is the book's most obvious failing. Another is its failure to indicate the kind of

> research methodology which would give concrete expression to the alternative view of educational inquiry it advocates and defends. (Carr, 1985, p. 232)

This criticism by Carr is fundamentally a criticism of the role of the evaluator simply giving an account of people's work (even with democratic processes for the release and validation). It leaves knowledge production and reporting largely in the hands of the external evaluator.

Other advocates of the critical approach have been much more explicit about the kind of evaluation and research commitments it entails. Comstock, for example, described it in these terms:

> Critical social research begins from the life problems of definite and particular social agents who may be individuals, groups or classes that are oppressed by and alienated from social processes they maintain or create but do not control. Beginning from the practical problems of everyday existence it returns to that life with the aim of enlightening its subjects about unrecognized social constraints and possible courses of action by which they may liberate themselves. Its aim is enlightened self-knowledge and effective political action. Its method is dialogue, and its effect is to heighten its subjects' self awareness of their collective potential as the active agents of history... Critical research links depersonalized social processes to its subjects' choices and actions with the goal of eliminating unrecognized and and contradictory consequences of collective action. (Comstock, 1982, pp. 378-379)

Leaving aside the issue of the appropriateness of the language he uses, I want to explore how Comstock envisages the role of researchers (and evaluators) with respect to program participants. Comstock went on to develop in somewhat programmatic form the way in which a critical researcher must work. Of particular note was the commitment to

> Participate in a theoretically grounded program of action which will change social conditions and, in addition, will engender new less alienated understandings and needs... Critical researchers do not, therefore, enter progressive groups on an episodic basis to solve clearly defined problems. Since their aim is to stimulate a self-sustaining process of critical analysis and enlightened action, it becomes necessary for critical researchers to ally themselves with progressive groups and work with them for considerable periods of time. (Comstock, 1982, p. 386)

In this view, the researcher comes closer to engaging the political struggle with the social actors in the situation under study. But as Kemmis (1983) has noted, Comstock still reserved a somewhat special and privileged place for the researcher who in important ways in this conceptualisation still controls the conceptualisation of plans. But several points Comstock made here are relevant to the question of what an (admittedly idealised) image of democratic work by a researcher might be. First, the identification of the program in which the work to be engaged is not predicated upon the bureaucratic necessity of an 'evaluation'. Rather, research skills are put at the disposal of 'progressive groups' who have essentially defined themselves a priori. Second, the substance of the work is not determined by a bureaucratic definition of a case or the sphere of action supposedly influenced by the targeted dispersal of funds. Third, the duration of engagement is not determined by costing and review schedules but by the ordinary progress of the work. In turn these produce a quite different relationship between between the researcher and 'program' participants. In this view, we can no probably longer speak of 'programs' at all, and terms like 'movement' might seem more appropriate.[1]

If we accept the idea of democracy that underpins the Comstock proposal, the state and its institutional infrastructure plays a less central role in the production of knowledge about programs of reform. What place is there for 'democratic evaluation' of the kinds practised by

[1] Note that the evaluation (conceived somewhat in traditional terms) of PUSH/EXCEL was considered less than feasible by its appointed evaluators because it was a 'movement' and not a 'program'

'external' evaluators in forms of democratic life like the one Comstock proposes? Of course, it is unfair to compare the harsh realities of one kind of practice with an unrealised ideal. Nevertheless, we can recognise some important shortcomings of 'democratic evaluation' in a bureaucratised state. But how do we go about correcting them: via the further refinement of democratic evaluation, or from a different tack altogether?

A more recent proposal from Lakomski (1985) asserted the importance of educational practitioners playing a primary role in educational enquiry. The critical epistemology which underpinned her advocacy was based on a rather dismissive critique of Habermas, but other authors have used Habermas' theory of knowledge constitutive interests and critical theory more generally to develop an epistemology which seeks to justify action research (and self-evaluation) as an appropriate approach to program evaluation. In doing so these authors try to recast the role of the 'external' researcher. They also work from a different concept of democracy.

Such approaches to evaluation argue that understanding the nature of the program (or movement) is impossible if the struggle to change is not directly engaged. That is, there is an explicit challenge to the 'externality' of the evaluator. In these approaches, the organization of political action aimed at emancipation (to use Habermas' somewhat grand term[1]) is inextricably linked with educational improvement and the growth of critical understanding. Enquiry is always an opportunity, a commitment to address questions of disadvantage, powerlessness, irrationality and injustice with action as well as through the research act itself. These approaches have an explicit politics directed not only at reducing the distortions produced in the kinds of scenario portrayed earlier, but at actively confronting with participants the power differentials which produce the distortions in the first place. The aim of such approaches to evaluation is not to correct the perceived failings of the relationship between evaluators, sponsors and the state by improving the ways knowledge production is controlled, but by changing the way it is knowledge is 'produced' in the first place. But these approaches present us with another set of problems which may not mean that the outcome is any more democratic than the conceptualisation it replaces.[2]

The 'emancipatory critical' approach to democratic evaluation

Kemmis has attempted in several places (1980a, 1982, 1983, 1986, 1987) to develop the argument that there is a specific need to move towards emancipatory critical approaches to the evaluation of educational programs. In the emancipatory critical approach, the 'evaluator's' aspiration is not 'scientific objectivity' nor 'disciplined subjectivity' but to participate with others in a process of collective action and self-reflection -- the struggle to improve education through the aggregation of critically examined individual efforts conceived as part of a group commitment. Participation in the evaluation process, in the critical community, informing and informed by the evaluation, is crucial. It is argued that the change in focus is such that the language of evaluation is no longer appropriate. In more recent work, Kemmis and others have begun to move move the discourse away from the language of evaluation (except occasionally to refer to the notion of 'self-evaluation') and to argue instead for action research (Carr and Kemmis, 1986; McTaggart and Garbutcheon-Singh, 1986, 1988; Kemmis and McTaggart, 1988a, 1988b). The idealisation of action research envisages quite different notions of democracy from those implicit in the Principles of Procedure to which I have referred.

A particular kind of action research is envisaged -- a kind which can actually help resist the kinds of domination sustained and confirmed by so-called 'democratic' approaches to

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[1] It is also patronising and contradictory to think you are going to emancipate people more effectively than they can do it for themselves.

[2] It is also possible that in practice democratic evaluation (as the term is usually understood) as an aspiration is wrongheaded anyway. In the real politik of educational systems, people without power may be in stronger position after an 'evaluation' if they can discredit it by demonstrating that their views have been ignored, that they would be if their views have ostensibly been taken into account.

evaluation. In this kind of action research it is argued, researchers and evaluators might join other system participants in collective work to improve education in quite different organisational and social arrangement to those implied by even the best practices of 'external' evaluation. In these forms of social organisation a key idea is the commitment to group engagement in action and reflection. One key feature of this work is the elevation of the status of the production of knowledge through the experience of educational and social work.

There is a somewhat problematic ideal underlying each of these concepts -- the ideal of 'symmetrical communication' which derives from Habermas conceptualisation of an 'ideal speech situation' (Brandt, 1978, 1979; Werner and Drechsler, 1978; Kemmis, 1980b, Carr and Kemmis, 1986). It means the use of discourse to attempt 'to come to an agreement about the truth of a problematic statement or the correctness of a problematic norm carries with it a supposition that a genuine agreement is possible'. Habermas argued that provided the 'rational' decision is based solely on better argument, such agreement is possible. The characteristic demanded of discussion to achieve this end is that it be 'free from all constraints of domination, whether their source be conscious strategic behaviour or communication barriers secured in ideology or neurosis'. 'In particular, all participants must have the same chance to initiate, and perpetuate discourse, to put forward, call into question, and give reasons for or against statements, explanations, interpretations and justifications. Furthermore, they must have the same chance to express attitudes, feelings, intentions and the like, and to command, to oppose, to permit, to forbid, etc.' (McCarthy, 1978, cited in McTaggart and Fitzpatrick, 1981)

The logical and practical possibilities of the 'ideal speech situation' where discourse is 'freed from the constraints of action' in the interests of the pursuit of truth have been challenged in several ways (Nielsen, 1983; Connolly, 1987). One cluster of criticism questions its fundamental consensualism, arguing instead that all aspects of speech are fundamentally contestable. Another related cluster of concern challenges the assumption that people will become committted to discourses which, through their symmetry, act against their own interests (throwing away the advantages they have achieved because of the inequities capitalism creates). However, it is important to recognise that the idea was presented by Habermas as a working proposition (and now seems to attach less importance to it).

We should not discard the possibility of more symmetrical communications on the basis of such theoretical analysis without at the same time examining the ways the idea has been taken up in practice, for example, through a general commitment to rationality through 'reasonableness'. The possibilities for more symmetrical communications can appropriately be tested by participants in social and educational action through reflection on the ways in which their own group processes facilitate or frustrate the efficacy of their action and the evolution of their understandings. We must recognise that concrete coercion, hegemony and curtailed understanding of many kinds get in the way, but the useful question is whether there is any evidence that people can aspire to and begin to recognize authentic improvement in practice, understanding and social organisation for themselves. The examples of Paulo Freire's work and the Nicaraguan Literacy Campaign (Lankshear, 1986) suggest that it is reasonable to be optimistic on that score. From that work we find another sense of the practice of democracy which is captured somewhat polemically by Giroux who uses the concept of the resisting intellectual' to identify those who want to work together to change existing patterns of social relationship and organisation and knowledge production:

> Resisting intellectuals is a category that draws from the insights of both Gramsci and Paulo Freire. This term is indebted to Gramsci's notion of the organic intellectual but differs in that it suggests that such intellectuals can emerge from and work with any number of oppositional groups, other than and including the working class, that advance emancipatory traditions within and outside of alternative public spheres. Central to the category of resisting intellectuals is the interplay of the languages of critique and possibility. Utilizing the language of self critique, resisting intellectuals employ the discourse of self criticism as well as forms of critical analysis that interrogate the ideological and material practices of domination. Furthermore, resisting intellectuals take their cue from Freire and

> develop a critical vernacular that is attentive to the problems experienced at the level of everyday life, particularly as these are related to pedagogical experiences connected to classroom practice. The language of critique unites with the language of possibility when it points to the conditions for new forms of culture, alternative social practices, new modes of communication, and a practical vision for the future. (Giroux, 1986, p. 39)

That is, according to this line of argument, by being a member of an 'oppositional group' engaged in collective action and reflection, the 'individual' is in a position to both confront and unmask the power relations implicit, for example, in bureaucratic rationality, with some measure of safety -- politically with respect to others, and psychologically with respect to himself or herself. The comparison with the exposure of the vulnerable individual (and vulnerable report) in democratic evaluation is significant.

Is there a role now for democratic approaches to evaluation governed by the principles of procedure mentioned earlier? Perhaps they are a way of teaching people the virtues of the explicitly self-reflective approaches. Efforts to move incrementally from one paradigm to another are fraught with obvious danger. Sometimes the dangers are quite explicit. For example, in the Victorian Education Ministry, the installation of corporate managerialism (under a Labour Party government) has tried to revamp completely the 'School Improvement Plan' (which had laboured long and hard to get action research going in schools) so that it became responsible for its corporate vision of 'accountability'. One of the problems action research advocates must confront in situations like this is the cooption of all of the language and most of the important ideas of action research to subvert its fundamental aims. Nevertheless, there is some evidence from several projects that a transition from democratic evaluation to critical community can be achieved in the context of 'assisted self-evaluation' (Kemmis, 1986). Within these projects there is a range of activities from conventional democratic evaluation approaches (for example, to help initiate self-reflection by identifying apparent contradictions in current practice), 'co-authorship' (Tripp, 1983), right though to explicitly emancipatory action research. It could be argued that because the diversity of activity is within each project a methodological paradigm shift has already occurred. In that case the question still remains, but can be approached from a more general perspective.

What are the events which can cause 'naturally occurring' groups to become self-critical? Individuals sometimes identify significant events which seen to act as 'triggers for transformation' (McTaggart and Garbutcheon-Singh, 1986, 1988), but that view is individualistic and denies the importance of biographical trajectory and historical location. Retallick suggested that a group can become a critical community when participants are ready to examine their

> values as being interactively constructed, as constitutive of the community rather than being given, accepted or imposed. This suggests that a community might become critical when participants regard their values as objects of examination, interpretation, critique and reconstruction through dialogue. Values are seen as problematic in a self-conscious sense. Perhaps all groups of people who share values to a reasonable degree at least have a potential to become critical communities, that is to say they are latent critical communities which can theoretically be transformed into self-conscious or critical communities. (Retallick, 1986, p. 4)

In this view, the development of a critical community is not seen as a momentary transformation (as the term 'enlightenment' may sometimes suggest), but rather the ongoing work of reconstructing a view of the world through action and reflection. Evaluation studies which seek to unveil (or at least postulate) the ideological underpinnings of the forms of organization, discourse, and practice in educational institutions may be quite helpful in creating the possibility for a group to become a critical community, or for encouraging the actual formation of incipient groups. Of course, it should be noted that such an evaluation approach has gone beyond phenomenology, and has taken a critical turn. But in the view of action researchers, interpretive

accounts, even those involving ideology critique, are deficient. They argue that critique of interpretivism and critical hermeneutics must be sustained, the production of research and evaluation findings is not enough. As Mao Tse Tung once observed:

> If you want to know a certain thing or a certain class of things directly, you must personally participate in the struggle to change reality, to change that thing or class of things, for only thus can you come into contact with them as phenomena; only through personal participation in the struggle to change reality can you uncover the essence of that thing or class of things and comprehend them. (Mao Tse Tung, cited in Stenhouse, 1980, p. 43)

What are the ways to achieve that, by democratising evaluation practice or by refusing the potential cooptiveness of 'evaluation' roles in favour of a completely different conceptualisation of the relationship between researchers and researched? And if the latter, what are the discursive, practical, and organisational routes which lead in concrete practice away from hegemonic and concrete constraints on the one hand, and a disempoweringly polemical idealism on the other?

The possibility of convergence

There are two perspectives taken here: one is a short exposition on the undemocratic distortion of institutionalised form of 'democratic evaluation' apparently at least for undemocratic purposes; the other is a somewhat optimistic set of propositions about the way in which the relationships might turn out if conceived in terms of a participatory conceptualisation of democracy. There is a risk of lapsing into dualistic thinking here and of confusing strategic wisdom with cooption. The dualism can be approached by examining concrete efforts to democratise evaluation practice. Before proceeding I want to make another point to complicate things. I have suggested above that democratic Principles of Procedure can be corrupted to distort the accuracy of an evaluation report. But other things can go wrong as well. For example, the criteria of fairness might be used by participants who do not recognise aspects of their behaviour as racist to stifle an account of it (at least in these terms). The criteria of relevance and accuracy raise similar kinds of issues, which at the very least may profoundly the delay the evaluation report by repeated cycles of negotiation. And finally, whose criteria of fairness, relevance and accuracy are most appropriate and actually applied in the situation.?

One of the difficulties we face is a real shortage of empirically grounded analyses of the roles democratic evaluation and action research have played in people's lives. From the perspective of democratic evaluation, Simons' Getting to Know Schools in a Democracy (1987) is the most thorough analysis of theory and practice, but it is historically contained and I think as a result sees the possibilities for broader social change as tilting at windmills. There is also a chance that she is being realistic about the possibilities of access to programs for evaluators. She quotes MacDonald and Norris: 'It is difficult to change what you do not understand' (p. 83). In recent times I have handed back a standard government contract for an evaluation basically because the government department negotiators would not amend the contract to include Principles of Procedure like those appended. Though one negotiator considered the Principles 'wholesome', the government department would not agree to allow unfettered publication once the report was considered fair, relevant and accurate. I often wonder late at night if I did the appropriate thing. Wasn't there a chance even there that I might work in educative ways, and if necessary around the constraints of the contract? I still don't think so because of the political climate at the time, but ...

In action research, I find the best documented account is still the Ford Teaching Project (Elliott and Adelman, 1973a, 1973b), but Adelman (1989) himself laments the lack of appropriately documented examples of action research. Especially lacking are accounts of projects which actually examine the claim that action researchers have become 'emancipated' or 'critically conscious' as a result of their activities (see Grundy, 1987). We might find better examples of that in cross-cultural participatory (action) research literature (Lankshear, 1986), but it may be

that in those situations concrete oppression is more important than hegemony and is accordingly more accessible to understanding and amenable to resistance.

Because of the way power is distributed in the hierarchical, bureaucratic systems typical in education, the systemic role even of 'democratic' evaluators may always be to strengthen the hand of senior bureaucrats. As the instance cited in this paper suggests, there are local effects as well. Even the most democratic evaluation may be less help to the already disadvantaged than system-level analyses of the relationship between knowledge and power (like Lakomski's) will show. Furthermore, democratic evaluators may not discover the reflexivity of their work. The scenario outlined in this paper lurched into the perceptual field of the evaluators almost by chance. In general, such issues are unlikely to surface in accessible forums, and even when they do, evaluators are likely to have disappeared from the scene.

Democratic evaluators and action research advocates are generally agreed that an important goal of their work is to help people to engage the struggle to change themselves, their situations, and their relationships with colleagues, institutions and communities. They differ in that action research advocates in the critical tradition see critical theory as a useful resource, and in a commitment to engage more directly in the political struggle which attends and informs the research act. It is a moot point as to which approach would immediately or ultimately make educators and education itself less vulnerable to the hierarchical failings of the bureaucratic systems and institutions in which they work. My sense is that we ought to start as we mean to go on, by supporting people in their quests to improve themselves, but I think we must keep on the agenda the criteria by which improvement should be judged, and the limits on the kinds of opportunities afforded by different kinds of enquiry. That, I think, is the critical project, and while democratic evaluation might provide some opportunities, I really think it will take a more substantial change in educational enquiry to achieve it. We need to think not only in terms of the validity of knowledge claims but also of the validity of research as a democratic act. That requires us to engage the struggle not only to change evaluation practice, but to work for change in the institutional and social contexts in which evaluation occurs.

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APPENDIX

PRINCIPLES OF PROCEDURE[1]

a. Independence

(i) No participant in the project will have privileged access to the data of the evaluation.

(ii) No participant will have a unilateral right or power of veto over the content of the report.

b. Disinterest

(i) The evaluators will attempt to represent, as widely as possible, the range of viewpoints encountered in the evaluation, rather than to enunciate their own perspectives or private views.

(ii) The evaluators recognize that explicit or implicit recommendations appearing in reports will not be regarded as prescriptions by programme participants. As far as possible, however, the evaluators will attempt to present recommendations from participants rather than to use the evaluation as a platform for their own preferences.

c. Negotiated access

The evaluation will seek only 'reasonable access' to relevant data sources. The evaluators will assume they can freely approach any individual involved in the project to collect data. Those approached should feel free to discuss any matters they see fit. All such discussions will be treated as privileged by the evaluators. The evaluators are bound to portray the project and the issues it raises, but the release of specific information likely to identify informants will be subject to negotiation with these informants.

d. Negotiation of boundaries

(i) The evaluation will be issues-oriented. The principles for inclusion of concerns, perspectives or information in the study or its reports are that these concerns, perspectives or items of information contribute to understanding the project, especially in so far as it is variously understood by participants in and observers of the project from their different points of view. A major task for the evaluation, therefore, is to attempt to piece these disparate perspectives together into a coherent (though not necessarily synthetic or 'complete') account of the project as a whole. Thus, according to this principle of inclusion, the perspectives of all participants and interested observers have a 'right to be considered' in the evaluation.

(ii) The principle for exclusion of concerns, perspectives or information is that they can be shown to be false or unfounded, irrelevant to the project, or to unfairly disadvantage individuals or groups involved with the project.

e. Negotiation of accounts

(i) The criteria of fairness, relevance and accuracy form the basis for negotiation between the evaluators and participants in the study. Where accounts of the work of participants' involvement in the project can be shown to be unfair, irrelevant or inaccurate, the report will be amended. Once draft reports have been negotiated with participants on the basis of these criteria, they will be regarded as having the endorsement of those involved in the negotiations with respect to fairness, relevant and accuracy.

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[1] Adapted from Kemmis, S., and Robottom, I. (1986).

(ii) The process of negotiation of accounts will, where necessary, be phased to protect participants from the consequences of one-way information flow. Parts of a report may first be negotiated with relevant individuals who could be disadvantaged if the report were negotiated as a whole with all participants.

f. Negotiation of release

(i) There will be no secret reporting. Reports will be made available first to those whose work they represent. Circulation will be phased so that members of the primary audience will receive reports earliest, with other audiences receiving them later.

(ii) The release of reports for circulation beyond the community of interests formed by members of the primary audience and the evaluators is a matter for negotiation and decision within this community of interests. Given that the reports have been 'endorsed' as fair, relevant and accurate by the procedure of negotiation of accounts, release of a report to secondary or other audiences would unfairly disadvantage any member of the primary audience. In this case, an amended version of the report may be prepared which would overcome this obstacle to its release, viz. a version of the report which does not, by its release, disadvantage any member of the primary audience. Any such amended version must still be acceptable to the primary audience as a fair, relevant and accurate account of the project, however.

(iii) In keeping with the foregoing principles of procedure, the circulation of reports will be restricted unless the report has been cleared for unrestricted circulation. Restrictions on circulation will be clearly indicated on the cover pages of all reports.

g. Publication

(i) Reports will be released for wider circulation only in the form established by the procedure of negotiation of accounts; that is, they must be 'endorsed' by the members of the primary and other audiences as fair, relevant and accurate. Any published report must first of all meet this criterion.

(ii) The evaluators reserve the right to disavow any incomplete or summary version of the report which purports to be a report of this evaluation.

(iii) Any report to be published should have been produced according to these principles of procedure.

(iv) It is the expectation of the evaluators that the sponsor of the evaluation will have right of first refusal on publication.

h. Confidentiality

(i) The evaluators will not examine files, correspondence or other documentation without explicit authorization and will not copy from those sources without permission.

(ii) Interviews, meetings, and written exchanges will not be considered 'off-the-record', but those involved are free, both before and after, to restrict aspects or parts of such exchanges, or to correct or improve their statement. Quotations, verbatim transcripts and attributed observations, judgements, conclusions or recommendations, where these are used in such a way as to identify their sources, will be used in reports only with the authorization of the informant (i.e. the authorization achieved by the procedure of negotiation of accounts). Where information is general or where the sources are sufficiently obscured so as to defy identification of specific individuals, no clearance will be sought.

(iii) The evaluators are responsible for the confidentiality of data collected by them in the course of the evaluation.

(iv) In general, it should be noted that these confidentiality rules cannot be used to withdraw reports from general view; once fair, relevant and accurate accounts have been released and when they are presented in ways which do not unnecessarily expose or embarrass participants, such reports should no longer be sheltered by the prohibitions of confidentiality.

i. Accountability

The evaluators cannot make all their records publicly available without breaching the evaluation's principles of procedure. Nevertheless, the evaluation and the evaluators must be accountable to sponsors, project participants and the evaluation audiences. Thus:

(i) The evaluation will keep appropriate financial and administrative records which will be open to its immediate sponsor.

(ii) The evaluation will be accountable to participants as outlined in these principles of procedure.

j. Agreement to these principles of procedure

(i) The evaluators cannot be held responsible for breaches of these principles by others involved in the evaluation. It is the responsibility of members of the primary and other audiences of the evaluation to respect the confidentiality of reports and any restrictions on their circulation.

(ii) In commissioning this evaluation study and in accepting the commission, the sponsor and the evaluators agree to abide by these principles of procedure.